

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re:)	In Proceedings for a Reorganization under
)	Chapter 11
W.R. Grace & Co., <i>et al.</i> ,)	Case No. 01-01149-JKF
)	Re: docket no. 20378
Debtors.)	
)	
)	

DECLARATION OF STEVEN KAZAN

I, Steven Kazan, do hereby declare the following to be true under the penalty of perjury:

1. I am a partner with the law firm of Kazan, McClain, Lyons, Greenwood & Harley, A Professional Law Corporation ("Kazan McClain").
2. Kazan McClain is one of the "MMWR Firms" for purposes of the Response and Objection of MMWR Firms to Libby Claimants' Motion to Compel Debtors to Respond to Libby Claimants' Document Request.
3. Kazan McClain represents numerous asbestos personal injury claimants in the above captioned bankruptcy case (the "Claimants").
4. On the Claimants' behalves, Kazan McClain has submitted to the Debtors the information requested on the Debtors' Asbestos Personal Injury Questionnaires (the "Information").
5. Kazan McClain in conjunction with the other MMWR Firms, engaged in hard fought and difficult litigation that resulted in this Court entering a number of protective orders and bench orders, and in agreements being stated on the record at hearings, that imposed

confidentiality and other restrictions upon the Debtors, including, but not limited to, a restriction that the Information may be used for no purpose other than estimation, and a limitation on access to the Information to certain specifically identified individuals.

6. Kazan McClain produced the Information to the Debtor in full and complete reliance on these protections. If not for these protections, Kazan McClain would have exhausted all possible avenues of review before producing the Information provided to the Debtor.

7. The various confidentiality, use, and other protections and restrictions ordered and endorsed by this Court relating to the Information were the prerequisite to the Debtor's obtaining the information that was provided in response to its Questionnaire.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 7th day of January, 2009.



Steven Kazan